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15 *Attorneys for Proposed Intervenors.*

16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

18 LA ALLIANCE FOR HUMAN  
19 RIGHTS, et al.  
20 Plaintiff(s),  
21 vs.  
22 CITY OF LOS ANGELES, et. al.  
23 Defendant(s).

24 CASE NO. 20-CV-02291-DOC-KES

25 Hon. David O. Carter  
26 Courtroom 1

27 **PROPOSED INTERVENORS'**  
28 **REQUEST FOR JUDICIAL NOTICE**

Date: None  
Time: None  
Ctrm: 1

Complaint Filed: March 10, 2020

1                   **TO THE COURT, PLAINTIFFS, DEFENDANTS AND THEIR**  
2 **ATTORNEYS OF RECORD:**

3                   Pursuant to Rule 201 of the Federal Rules of Evidence, Proposed  
4 Intervenor respectfully request that the Court take judicial notice of the  
5 following court documents:

6                   1.       Complaint: Civil Rights, *Los Angeles Catholic Worker et al. v. Los*  
7 *Angeles Downtown Industrial District Business Improvement District et al.*, 2:14-  
8 cv-07344, Docket No. 1, filed September 19, 2014. A true and correct copy of the  
9 complaint is attached as **Exhibit A**.

10                  2.       Stipulated Order of Dismissal, *Mitchell et al. v. City of Los Angeles*  
11 *et al.*, CV16-01750 SJO (JPRx), Docket No. 119, filed May 31, 2019. A true and  
12 correct copy of the Stipulated Order of Dismissal is attached as **Exhibit B**.

13                  3.       Order Denying Motion to Intervene for Lack of Jurisdiction,  
14 *Mitchell et al. v. City of Los Angeles et al.* CV16-01750 SJO (JPRx), Docket No.  
15 127, filed August 27, 2019. A true and correct copy of the order is attached as  
16 **Exhibit C**.

17                  4. The fact that the City of Los Angeles filed Brief of Amicus Curiae of  
18 City of Los Angeles on Petition for Writ of Certiorari to the United States Court  
19 of Appeal for the Ninth Circuit on *City of Boise v. Martin*, Case No. 19-247, filed  
20 on September 25, 2019. A true and correct copy of the docket of the United  
21 States Supreme Court is attached as **Exhibit D**.

22                  5.       The County of Los Angeles joined the Brief of Amicus Curiae of  
23 California State Association of Counties and 33 California Counties and Cities on  
24 Petition for Writ of Certiorari to the United States Court of Appeal for the Ninth  
25 Circuit on *City of Boise v. Martin*, Case No. 19-247, filed on September 25, 2019.  
26 A true and correct copy of the docket of the United States Supreme Court is  
27 attached as **Exhibit D**.

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6. Central City East Association joined the Brief of Amicus Curiae International Downtown Association, California Downtown Association, Central City East Association Of Los Angeles, Hollywood Property, Owners' Alliance, Historic Business Improvement District, Property Owners Association, and Downtown Property Owner Association in Support of Petitioner for Writ of Certiorari to the United States Court of Appeal for the Ninth Circuit on *City of Boise v. Martin*, Case No. 19-247, filed on September 25, 2019. A true and correct copy of the docket of the United States Supreme Court is attached as **Exhibit D.**

Federal Rule of Evidence (“Fed. R. Evid.”) 201 permits a Court to take judicial notice of a “fact that is not subject to reasonable dispute because it (1) is generally known with the trial court’s territorial jurisdiction; or (2) can be accurately and readily determined from sources whose accuracy cannot be reasonably be questioned.” Fed. R. Evid. 201(b).

A court “may take judicial notice of undisputed matters of public record, including documents on file in federal or state courts.” *Harris v. Cty. of Orange*, 682 F.3d 1126, 1132 (9th Cir. 2012) (internal citations omitted)

Proposed Intervenor request this Court take judicial notice of the following documents, which are all on file in federal court.

Dated: March 18, 2020    Respectfully submitted,

LAW OFFICE OF CAROL SOBEL

LEGAL AID FOUNDATION OF LOS ANGELES

SCHONBRUN SEPLOW

HARRIS & HOFFMAN LLP

/s/ Catherine Sweetser  
By: Catherine Sweetser  
*Attorneys for Plaintiffs for Intervenors*